



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504 • (206) 753-2353

March 25, 1983

Carson May
American Crossarm and Conduit
99 S.W. Chehalis Avenue
P. O. Box 626
Chehalis, Washington 98532

Subject: Interim Status Standards Inspection Conducted
February 8, 1983

Dear Mr. May:

On February 8, 1983, Howard Steeley, Jon Neel and myself met with you and Gene Cole to discuss a zero discharge wastewater system and your compliance with the Federal Resource Conservation and Recovery Act (RCRA) and regulations enacted under 40 CFR, Parts 260-265. As we explained, the State of Washington promulgated its own Dangerous Waste Regulations, Chapter 173-303 WAC, in March, 1982. Enclosed please find a copy of the inspection compliance checklist/questionnaire that was completed during our visit.

As you will see by reviewing the questionnaire, the Company is in gross violation of Chapter 173-303 WAC and the equivalent portions of 40 CFR, Parts 260-265. However, in this letter, I would like to address only those items that will immediately impact the preservation of human health and the environment.

First, the fact that you are disposing of K001 waste in an impoundment that you did not address in your Part A permit application constitutes a violation of 173-303-820(2)(b), as does storing K001 waste from the impounding tank, in the 6,000 gallon tank prior to disposal. Therefore, your Part A permit application must be amended.

Second, in that you are, and will be until October 15, 1983, discharging wastewater to the impoundment for disposal, you are required to institute a groundwater monitoring program to determine the effects of the contents of the impoundment, K001, on the uppermost groundwater aquifer, as per 173-303-400(3)(a), which references 40 CFR, Part 265, Subpart F. Therefore, it is advised that you contact a qualified geologist or licensed geotechnical engineer for the preparation of a scope of work for a groundwater monitoring investigation and submit it for approval.

Doc 3063

AR 1.6 000.6

American Crossarm

2-8-83

J. No 61

Pentachlorophenol	< 10 micrograms/liter
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"<" is "Less Than" and ">" is "Greater Than"

Rev. 9/81

L. Freeman

DATE

3-1-83

P. Crawford

DATE _____

3-1-83